

EXHIBIT 2



Wook Chung

Of Counsel

Admitted in: New York & New Jersey

437 Madison Avenue

New York, NY 10022

Tel: 212-867-9500

Direct Dial:

212-867-9500

Fax:

212-599-1759

Email:

wchung@mmwr.com

February 3, 2021

BY U.S. MAIL

Barthco International, Inc.
d/b/a OHL International
4995 La Cross Rd., Ste 1350
North Charleston, SC 29406

Re: Arbitration / Payment Demand
Detention, Demurrage, and Other Charges Owed to Hanjin Shipping, Inc.
Outstanding Amount: \$482,573.00

To Barthco International, Inc. and Whom It May Concern:

We are attorneys for Hanjin Shipping Co., Ltd. ("Hanjin Shipping") and Jin-Han Kim, the Trustee of Hanjin Shipping.

Hanjin Shipping's records indicate that Barthco International, Inc. presently owes \$482,573.00 in unpaid detention and demurrage from shipments carried and delivered by Hanjin Shipping through 2016. Hanjin Shipping has fully performed all duties and obligations required of it for the said shipments, and Barthco International, Inc. has received the said shipments, together with invoices tendered for payment, without objection. Furthermore, the detention and demurrage, together with other incidental charges incurred by Hanjin Shipping, were incurred as part of the said shipments.

We attach copies of the outstanding invoices which previously were submitted to you for payment. The said shipments and disputes are governed by Service Contract No. AEF166288 between Hanjin and Barthco International, Inc. on 8/15/2016. The Service Contract provides, in relevant part, for resolution of disputes by arbitration in New York.

We thus propose the appointment of **David W. Martowski** to act as the sole arbitrator for this dispute. Hanjin Shipping will seek payment in the arbitration of the outstanding amounts owed. For information and reference, Mr. Martowski's CV is available for viewing at:

- https://www.arbitrationclub.org/members/david-w-martowski/_res/id=File1/david-w-martowski.pdf

MONTGOMERY MCCRACKEN WALKER & RHOADS LLP

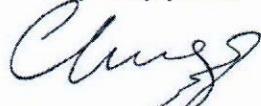
PENNSYLVANIA • NEW YORK • NEW JERSEY • DELAWARE

A PENNSYLVANIA LIMITED LIABILITY PARTNERSHIP
JOHN J. LEVY, NEW JERSEY RESPONSIBLE PARTNER

Montgomery McCracken Walker & Rhoads LLP

Barthco International, Inc.
February 3, 2021
Page 2

We look forward to receiving your soonest response to resolve the outstanding sum owed and, if this dispute cannot be resolved, your confirmation to the nominated arbitrator or your own nomination for our review.

Very truly yours,

Wook Chung

Encl.